
ENVIRONMENTAL ASSESSMENT WORKSHEET

This Environmental Assessment Worksheet (EAW) form and EAW Guidelines are available at the Environmental Quality Board's website at: <http://www.eqb.state.mn.us/EnvRevGuidanceDocuments.htm>. The EAW form provides information about a project that may have the potential for significant environmental effects. The EAW Guidelines provide additional detail and resources for completing the EAW form.

Cumulative potential effects can either be addressed under each applicable EAW Item, or can be addressed collectively under EAW Item 19.

Note to reviewers: Comments must be submitted to the RGU during the 30-day comment period following notice of the EAW in the *EQB Monitor*. Comments should address the accuracy and completeness of information, potential impacts that warrant further investigation, and the need for an EIS.

1. Project Title

Ritz Block

2. Proposer

Proposer: Opus Development Company, LLC
Contact Person: Matthew Rauenhorst
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3. RGU

RGU: City of Minneapolis
Contact Person: Becca Farrar-Hughes
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4. Reason for EAW Preparation

Check one:

Required:

- EIS Scoping
 Mandatory EAW

Discretionary:

- Citizen petition
 RGU discretion
 Proposer initiated

If EAW or EIS is mandatory, give EQB rule category subpart number(s) and name(s):

4410.4300 MANDATORY EAW CATEGORIES.

Subp.19. Residential development D. 375 attached units in a city within the seven-county Twin Cities metropolitan area that has adopted a comprehensive plan under Minnesota Statutes, section 473.859; and Subp. 32. Mixed residential and industrial-commercial projects with a sum of quotients exceeding 1.0; Connected Actions or Phased Actions per 4410.1000, subpart 4.

5. Project Location

County: Hennepin County, Minnesota

City/Township: Minneapolis

Address: 315 Nicollet Mall

PLS Location (¼, ¼, Section, Township, Range): T29, R24, S22

Watershed (81 major watershed scale): Mississippi River (Metro) #20

GPS Coordinates: 44.980001, -93.268658 (Approximate Project Center)

Tax Parcel Numbers: 22-029-24-44-0013

At a minimum attach each of the following to the EAW:

- County map showing the general location of the project; **See Exhibit 1.**
- U.S. Geological Survey 7.5 minute, 1:24,000 scale map indicating project boundaries (photocopy acceptable); and **See Exhibit 2.**
- Site plans showing all significant project and natural features. Post-construction site plan and Pre-construction site plans (**Exhibits 1-10**).

See Table of Contents for additional exhibit locations and appendices.

6. Project Description

- a. *Provide the brief project summary to be published in the EQB Monitor, (approximately 50 words).*

The proposed mixed-use project would result in the redevelopment of an approximate two and one-half acre site along Nicollet Mall in Downtown Minneapolis, between South 3rd and 4th Streets known as the Ritz Block. This phased development is anticipated to be developed in two separate phases and would provide at completion up to 728 dwelling units, 12,000 square feet of commercial space, and up to 909 off-street parking spaces. Alternatively, Phase 2 could be constructed with up to 365,606 square feet of office space instead of residential units.

- b. Give a complete description of the proposed project and related new construction, including infrastructure needs. If the project is an expansion include a description of the existing facility. Emphasize: 1) construction, operation methods and features that would cause physical manipulation of the environment or would produce wastes, 2) modifications to existing equipment or industrial processes, 3) significant demolition, removal or remodeling of existing structures, and 4) timing and duration of construction activities.

The Site comprises approximately 109,173 SF or 2.5 acres of developable property along Nicollet Mall, between South 3rd and 4th Streets in Minneapolis (the "Site"). The property currently consists entirely of a bituminous surface parking lot that includes a total of 254 off-street parking spaces. The Site is zoned B4-2 (Downtown Business) District and is located in the Nicollet Mall (NM) and Downtown Parking (DP) Overlay Districts (**Exhibits 3 and 4**). The project is located immediately southeast of the Minneapolis Central Library.

The proposed project would be developed in two phases: Phase 1, would include 364 residential units, up to 12,000 SF of ground level retail space, approximately 430 parking spaces, occupy approximately 60,524 square feet of land and is planned for construction in 2015-2017. Phase 2 would occupy the remaining 48,661 square feet of land and would be developed after Phase 1 is complete. It is anticipated that Phase 2 could also include up to 364 dwelling units, and approximately 479 parking spaces. Alternatively, and depending upon market conditions, Phase 2 could be an approximately 365,606 square foot office tower that includes up to 146 parking spaces. The two phases of the development would be taken independently through the City's land use, design and approval processes. A Conceptual Rendering of the two towers is provided in **Exhibit 5**.

Phase 1, as proposed, would develop a portion of the development parcel that has approximately 330 feet of frontage on Nicollet Mall and extends from 3rd St. S. to 4th St. S.; encompassing the entire western half of the full city block. A Conceptual Site Plan is provided in **Exhibit 6**. As currently proposed, Phase 1 includes a 32-story, rectangular-shaped building with a total of 430 parking stalls and 182 bicycle parking spaces. Five full floors of above-ground parking (2-6) are proposed and front on Nicollet Mall with a 24-foot wide mid-block access and egress proposed from 3rd St. S. and 4th St. S. City Staff has expressed strong concerns about the appearance of five inactive parking floors located directly adjacent to Nicollet Mall; the design of the building is compromised by parking that is not required. At grade parking is also located at the interior of the site. Bicycle valet and storage is intended at the north end of the building with street-level access to 3rd St. S. A commercial space is proposed at street level along Nicollet Mall, and would contain retail uses that may include a full-service restaurant with outdoor seating. As shown on the Concept Site Plan (Exhibit 6), a skyway connection is planned for Phase 1 over South 4th Street, which would allow direct pedestrian connection to the future Xcel Energy Building to the south. Anticipated building floor plans and use tables for Phases 1 and 2 are provided in **Appendices A and B**.

Exterior materials would include architectural precast and glass elements. Features of the Phase 1 building would include walk-up retail and office space along Nicollet Mall, a bicycle valet, bike shop, dog walk on the street level, fitness and swim club, and green roof/outdoor garden spaces on the seventh floor.

The proposed Phase 2 plan, which is conceptual, could similarly be a second 32-story residential tower with up to 364 housing units and 479 structures parking stalls or a 20-story tower with 365,606 SF of office and up to 146 structured parking spaces. Unlike Phase 1, no

retail/commercial space is currently contemplated for that building. A shared service drive would separate Phase 1 from Phase 2 as shown on the Concept Site Plan. As previously noted, the service drive is proposed to be approximately 24 feet wide.

Each phase would be reviewed by all applicable City Staff including Public Works and Community Planning and Economic Development (CPED) staff independently. Phase 1 would require the removal (relocation and demolition) of a portion of the existing bituminous parking surface, lighting structures and pay booths, and each phase would require excavation for below grade foundation structures, although no underground structured parking is proposed as part of the development.

Plans for Phase 2 of the project are conceptual at this time and would be dictated by market conditions and demands for residential and office space. Consequently, this EAW evaluates both concepts and addresses the relative impacts of residential or office development to provide a comprehensive evaluation depending on which option is chosen for Phase 2.

c. *Project Magnitude*

Table 5.1. Project Magnitude Data

Total Project Acreage	2.5
Linear project length	N/A
Number and type of residential units	364 – 728 Attached
Commercial building area (in square feet)	534,980 (Office/Retail)
Industrial building area (in square feet)	N/A
Institutional building area (in square feet)	N/A
Other uses – specify (in square feet)	Up to 909 parking stalls on site (parking structures)
Structure height(s)	Residential: 32 stories (425 to 450 feet); Office: 32 stories (325 to 350 feet)

Phase 1: 364 attached units and 12,000 SF of retail to be located on the western half of the Ritz Block. The building would be 32 stories and approximately 425’ to 450’ feet in height.

Phase 2 (Residential): 364 attached units to be located on the eastern half of the Ritz Block. The building would be 32 stories and approximately 425’ to 450’ feet in height.

Alternate Phase 2 (Office): 522,980 GSF building with 365,606 SF of office to be located on the eastern half of the Ritz Block. The building would be 20 stories and approximately 325’ to 350’ feet in height depending upon the use.

d. *Explain the project purpose; if the project would be carried out by a governmental unit, explain the need for the project and identify its beneficiaries.*

The purpose of the development is to redevelop a surface parking lot in Downtown Minneapolis with a mixed-use development that includes high density housing, retail and, potentially, office space. Both phases of the project would be developed by a private developer, with private funds and financing.

- e. Are future stages of this development including development on any other property planned or likely to happen? Yes No.

If yes, briefly describe future stages, relationship to the present project, timeline, and plans for environmental review.

Beyond Phase 2, there are currently no planned future stages of the Ritz Block development project.

- f. Is the project a subsequent stage of an earlier project? Yes No.

If yes, briefly describe the past development, timeline, and any past environmental review.

Not applicable.

7. Cover Types

Estimate the acreage of the site with each of the following cover types before and after development.

The Ritz Block Development Project would replace an existing bituminous surface parking lot with a mixture of high-density housing and commercial uses. Ritz Block Development plans include increased landscaping along sidewalks to enhance the public realm and an approximately 4,000 sq. ft. green roof (planned tray system) on a portion of the Phase I residential building amenity deck.

Table 7.1. Estimated Before and After Cover Types

Land Cover	Before (acres)	After (acres)
Wetland	0.0	0.0
Deep water/streams	0.0	0.0
Wooded/Forest	0.0	0.0
Brush/Grassland	0.0	0.0
Cropland	0.0	0.0
Lawn/landscaping	0.0	0.1
Impervious Surface	2.5	2.4
Stormwater Pond	0.0	0.0
Totals	2.5	2.5

If **Before** and **After** totals are not equal, explain why: Totals are equal.

8. Permits and Approvals Required

List all known local, state, and federal permits, approvals, certifications and financial assistance for the project. Include modifications of any existing permits, governmental review of plans, and all direct and indirect forms of public financial assistance including bond guarantees, Tax Increment Financing, and infrastructure. All of these final decisions are prohibited until all appropriate environmental review has been completed. See Minnesota Rules, Chapter 4410.3100.

The following table lists the primary permits and approvals needed for both Phases of the project.

Table 8.1. Permits and Approvals Required

Unit of Government	Type of Application	Status
Federal Permits and Approvals		
Federal Aviation Administration	Airspace Hazard Review/ Determination	To be applied for
State Permits and Approvals		
Pollution Control Agency	Sanitary Sewer Connection Permit	To be applied for
	Construction Stormwater Permit (NPDES)	To be applied for
	Registration permits for generators	To be applied for
	Stormwater Pollution Prevention Plan	To be applied for
Department of Health	Water Main System Extension Permit	To be applied for
Department of Natural Resources	Appropriation/Dewatering Permit	To be applied for, if needed
Minnesota Department of Transportation	Airspace Obstruction Permit	To be applied for, if needed
Regional Permits and Approvals		
Metropolitan Council Environmental Services	Approval of dewatering discharge (if necessary)	To be applied for
	Sanitary Sewer Connection Permit/SAC Fee	To be applied for
Mississippi River Watershed District	Grading/Stormwater Permit	To be applied for
Local Permits and Approvals		
City of Minneapolis	Building Permits	To be applied for as needed
	Lane Use/Obstruction Permit	To be applied for, if needed
	Right-of-Way Excavation Permit	To be applied for, if needed
	Sanitary Sewer Connection/Extension Permit	To be applied for, if needed
	Storm Sewer Connection/Extension Permit	To be applied for, if needed
	Erosion and Sediment Control Permit/Plan Approval	To be applied for, if needed
	Stormwater Management Plan	To be applied for
	Encroachment Permit	To be applied for, if needed
	Sidewalk Construction Permit	To be applied for
	Zoning - CUPs, Variances, Site Plan Review	To be applied for as needed
	Preliminary and Final Plat	To be applied for
	Certificate of Occupancy	To be applied for
	All Phase 2 permits	To be applied for as needed

Note: The project proposer would apply for and receive all applicable permits prior to project construction.

Cumulative potential effects may be considered and addressed in response to individual EAW Item Nos. 9-18, or the RGU can address all cumulative potential effects in response to EAW Item No. 19. If addressing cumulative effect under individual items, make sure to include information requested in EAW Item No. 19

9. Land Use

a. Describe:

- i. Existing land use of the site as well as areas adjacent to and near the site, including parks, trails, prime or unique farmlands.*

The existing land use within, and adjacent to, the Site is depicted on **Exhibit 7**. The Site is currently an asphalt surface parking lot that consists of 254 spaces and was formerly the site of the Sheraton-Ritz Hotel, which was constructed in 1961 and demolished in 1990. Adjacent land uses include: the Minneapolis Public Library; Xcel Energy's existing headquarters building and expansion under construction across 4th Street from the project Site; mixed-use residential towers; office towers; parking ramps and surface parking lots. The Site is within two blocks of the Nicollet Mall LRT station and has frontage for a full block along Nicollet Mall.

There are no parks, trails, or prime and unique farmlands within the project boundary. Cancer Survivor's Park and Gateway Park are both located within a few blocks of the project area.

- ii. Plans. Describe planned land use as identified in comprehensive plan (if available) and any other applicable plan for land use, water, or resources management by a local, regional, state, or federal agency.*

The *Minneapolis Plan for Sustainable Growth* (the City's Comprehensive Plan, 2009) designates the Site on the future land use map as Commercial, and the property has frontage on Nicollet Mall which is a designated Major Retail Center. General Commercial includes a broad range of commercial uses. Land Use Policy 1.4 of the Comprehensive Plan regarding General Commercial areas encourages the City to "[d]evelop and maintain strong and successful commercial and mixed use areas with a wide range of character and functions to serve the needs of current and future users." This Policy is supported by the following Implementation Steps:

- 1.4.1 Support a variety of commercial districts and corridors of varying size, intensity of development, mix of uses, and market served.
- 1.4.2 Promote standards that help make commercial districts and corridors desirable, viable, and distinctly urban, including: diversity of activity, safety for pedestrians, access to desirable goods and amenities, attractive streetscape elements, density and variety of uses to encourage walking, and architectural elements to add interest at the pedestrian level.

- I.4.3 Continue to implement land use controls applicable to all uses and structures located in commercial districts and corridors, including but not limited to maximum occupancy standards, hours open to the public, truck parking, provisions for increasing the maximum height of structures, lot dimension requirements, density bonuses, yard requirements, and enclosed building requirements.
- I.4.4 Continue to encourage principles of traditional urban design including site layout that screens off-street parking and loading, buildings that reinforce the street wall, principal entrances that face the public sidewalks, and windows that provide “eyes on the street”.

Downtown is also designated as a Growth Center. Growth Centers are characterized by a concentration of business and employment activity and a wide range of complementary activities, residential, office, retail, entertainment and recreational uses. Per the Comprehensive Plan, high intensity uses are encouraged to take advantage of premium locations in the Downtown Growth Center to strengthen the City’s core. Land Use Policy I.15 calls on the City to “[s]upport development of Growth Centers as locations for concentration of jobs and housing, and supporting services.” The following Implementation Steps for this Policy are relevant to the proposed project:

- I.15.1 Support development of Growth Centers through planning efforts to guide decisions and prioritize investments in these areas.
- I.15.3 Encourage the development of high- to very high-density housing within Growth Centers.

Nicollet Mall is designated as a Commercial Corridor and Major Retail Center. Land Use Policy I.10.1 supports a mix of uses such as retail sales, office, high-density residential along Commercial Corridors.

Other Comprehensive Plan Policies that are applicable to this type of project include the following, among others:

- Land Use Policy I.3 states: “Ensure that development plans incorporate appropriate transportation access and facilities, particularly for bicycle, pedestrian, and transit.” This Policy includes the following applicable Implementation Steps: (I.3.1) “Require safe, convenient, and direct pedestrian connections between principal building entrances and the public right-of-way in all new development and, where practical, in conjunction with renovation and expansion of existing buildings”; and (I.3.2) “Ensure the provision of high quality transit, bicycle, and pedestrian access to and within designated land use features.”
- Housing Policy 3.1 states: “Grow by increasing the supply of housing.” This Policy includes the following applicable Implementation Step: (3.1.1) “Support the development of new medium- and high-density housing in appropriate locations throughout the city.”
- Housing Policy 3.2 states: “Support housing density in locations that are well connected by transit, and are close to commercial, cultural and natural amenities.” This Policy includes the following applicable Implementation Step: (3.2.1). “Encourage and support housing development along commercial and community corridors, and in and near growth centers, activity centers, retail centers, transit station areas, and neighborhood commercial nodes.”

The project area is also within the boundaries of the planning area studied and discussed in the *Development Objectives for North Nicollet Mall* (1999). Development objectives identified in that document relate to transit and open space development, construction of a new Central Library, street and sidewalk enhancements and infill redevelopment. The following objectives are most applicable to the proposed project:

- 3.1 Increase the economic productivity of the project area by promoting complementary development of both public and private facilities.
- 3.7 Improve and enhance the pedestrian environment and pedestrian circulation through the development of skyways and indoor pedestrian spaces that connect the project area with public transit facilities and the Downtown Core.
- 3.8 Protect and enhance the form and character of the downtown built environment by ensuring that redevelopment is consistent with sound urban design principles.

The *Development Objectives* anticipate that land uses of new development in the area could be commercial office, hotel, residential or mixed use. All new development along Nicollet Mall should have ground-level, supportive retail and services facing the Mall.

The project would also be designed in general accordance with the City's *Local Surface Water Management Plan* (2006), the *Ten-Year Downtown Transportation Action Plan* (2007), and the *Ten-Year Citywide Transportation Action Plan* (2009).

iii. Zoning, including special districts or overlays such as shoreland, floodplain, wild and scenic rivers, critical area, agricultural preserves, etc.

The project is located in the following districts and overlay districts:

B4-2 Downtown Business District: The proposed project is located entirely within the B4-2 Downtown Business District as shown on Exhibit 3. As described in Section 549.380 of the City's Zoning Code, the B4 District is established to provide an environment for retail and office activities of citywide and regional significance. The district also allows entertainment, residential and public uses, which complete the mixed-use character of the area. Multiple-family dwellings, general retail, restaurant and office uses are permitted uses in the B4 District. Specific zoning requirements in the B4 District include the following:

- In the B4-2 subdistrict, the maximum floor area ratio (FAR) for structures is 16.
- There is no height limit within the B4 District.
- Residential uses and hotels containing windows facing an interior or rear yard are subject to setback requirements. There is no setback requirement for nonresidential uses.
- There is no minimum parking requirement except that residential buildings that do provide off-street parking shall designate 1 visitor space per 50 dwelling units. Residential uses are allowed a maximum of 1.5 spaces per dwelling unit. The maximum parking for non-residential uses varies by the type of use.
- One bike parking space is required per 2 dwelling units. Bike parking requirements for non-residential uses vary by the type of use.
- Loading requirements vary with the size and type of use.

NM Nicollet Mall Overlay District: Phase I of the proposed project is located partially located within the Nicollet Mall Overlay District as shown on Exhibit 4. As described in Section 551.870, the purpose of the NM Overlay District is to preserve and encourage the pedestrian character of the Nicollet Mall area and to promote street level activity by creating a pleasant and unique pedestrian environment. Development standards in the NM Overlay District include the following:

- The first floor of buildings shall be located not more than 8 feet from Nicollet Mall or abutting side streets.
- Portions of buildings over 10 stories that comprise more than 200 feet of frontage on Nicollet Mall shall be set back from the Mall not less than 30 feet beginning between the 3rd and 10th stories.
- At least 40% of first floor facades that face the street shall be glass.
- Retail or restaurant uses shall occupy at least 60% of the gross floor area of the first floor and shall extend along at least 60% of the first floor facade fronting on Nicollet Mall.

DP Downtown Parking Overlay District: The proposed project is located entirely within the Downtown Parking Overlay District as shown on Exhibit 4. As described in Section 551.730, the purpose of the DP Overlay District is to preserve significant and useful buildings and to protect the unique character of the downtown area and the mixed-use downtown neighborhoods by restricting the establishment or expansion of surface parking lots and establishing certain minimum and maximum off-street parking standards in the downtown area.

The DP Overlay District prohibits commercial parking lots, including the expansion of any existing commercial parking lot and further prohibits the conversion of any accessory parking lot to a commercial parking lot. A conditional use permit is required if any accessory parking lot is provided on-site to serve the principal use and accessory parking lots cannot exceed 20 spaces without a variance. At this time, no surface parking is proposed for either phase of the development.

According to FEMA Floodplain mapping (accessed December 2014), the project is located within Flood Panel 27053C0357E. The entire project is identified as being outside of either a 100 or 500-year flood zone (**Exhibit 8**).

There are no known wild and scenic rivers, critical areas, designated shorelands, or agricultural preserves within the project area. This Site is approximately 0.3-miles from the Mississippi River.

- b. *Discuss the project's compatibility with nearby land uses, zoning, and plans listed in Item 9a above, concentrating on implications for environmental effects.*

Surrounding properties also fall within the B4 District (subdistricts B4-1 and B4-2) and Overlay Districts as applicable; therefore, they have similar requirements and restrictions as those placed on the Ritz Block. The surrounding land uses are similar in nature and compatible with the residential, retail and office uses proposed for the Ritz Block.

The proposed project is generally compatible with the land uses called for in the Comprehensive Plan. The project would provide very high density housing, retail and, potentially new office space, within an area of concentrated employment and other complementary uses. This development would further support the City's goals for transit-oriented development due to its close proximity to LRT and bus transit services.

The proposed FAR of Phase 1 is 7.53 and the FAR for Phase 2 is anticipated to be between 9 and 10; all under the B4-2 maximum of 16. The project is expected to comply with vehicular and bicycle parking requirements and other generally-applicable code requirements. It is possible that variances would be requested from some standards of the Nicollet Mall Overlay District for Phase 1, depending on the final design of the project. As previously noted, no surface parking is proposed which would comply with the intent of the DP Overlay District requirements.

It is important to note that City Staff has expressed strong concerns regarding the design of the site as it has not been considered in a holistic fashion. This results in two similarly designed buildings with poor urban design that incorporate above-grade parking facilities resulting in inactive floors that directly abut the public streets and adversely impact the pedestrian realm. Feedback provided to the developer is noted as follows and has not yet resulted in any substantive design changes:

- The five floors of parking fronting along Nicollet Mall are a major concern for Staff considering the prominence of this downtown development site;
 - Providing active functions along Nicollet Mall is a basic urban design principal that has been largely ignored by this concept plan.
 - Substantial public investment is being dedicated to improve Nicollet Mall and the expectation is that development must respond to that investment. Additionally, the Downtown 2025 plan states that Nicollet Mall should be a "must see destination". Parking located above-grade and fronting on Nicollet Mall is not a "must see".
 - The developer has control over an entire City block and has not demonstrated any alternatives to above-grade parking. While there are a number of options for re-designing the site, some options that staff has discussed with the developer include:
 - o Incorporating below-grade parking;
 - o Providing structured parking in the center of the site that serves both Phase I and Phase 2.
 - o Altering the building footprint to create additional depth, allowing for units or other active uses to front along Nicollet Mall, while still providing enough space for parking and circulation at the interior of the site.
 - o Extending floors 2-6 above grade (cantilevering over the wide drive access) to allow space for active functions along Nicollet Mall, while still providing enough space for parking and circulation at the interior of the site.
- c. *Identify measures incorporated into the proposed project to mitigate any potential incompatibility as discussed in Item 9b above.*

If variances from the Nicollet Mall Overlay standards are required, potential mitigation factors that would be evaluated by CPED Staff and the Planning Commission could include enhancements to the Nicollet Mall pedestrian realm and the public benefit related to

replacement of a surface parking lot in the Downtown with high density, mixed use development.

However, the above-grade levels of parking proposed in both buildings abutting the public streets can only be fully mitigated by redesigning the building as noted above. Given the developer's control over the full block (which is approximately 2.5 acres in size), there are no restrictions that would require that parking be located above-grade, adjacent to the public streets resulting in inactivity that compromises the City's basic urban design principles.

10. Geology, soils and topography/land forms:

- a. *Geology - Describe the geology underlying the project area and identify and map any susceptible geologic features such as sinkholes, shallow limestone formations, unconfined/shallow aquifers, or karst conditions. Discuss any limitations of these features for the project and any effects the project could have on these features. Identify any project designs or mitigation measures to address effects to geologic features.*

Minnesota and U.S. Geological Survey information indicates bedrock geology underlying the Site consists of Platteville and Glenwood formations, which consist predominantly of limestone, dolostone (Platteville) and shale (Glenwood) (M-194 Bedrock Geology of the Twin Cities Ten-county Metropolitan Area, Minnesota-Mossler, John H. (2013). These formations are exposed almost continuously along the Mississippi River in Minneapolis and St. Paul. Bedrock elevations in this area are at an 800 mean sea level (msl) elevation, which is 30 to 50 feet below the ground surface in the area of the project, and would constitute a shallow limestone formation. The Site is located in a karst region and numerous karst features such as sinkholes, springs, and stream sinks are identified within one mile of the Site based on Karst Feature Inventory Points from the University of Minnesota, Department of Geology and Geophysics, but are not currently mapped on the Site.

Prior to construction, the project proposer would conduct geotechnical borings at the Site to determine whether these features pose any limitations on the project and what, if any, effect the project may have on potential geological features. If identified during site-specific studies, subsequent project designs would incorporate mitigation measures to address geologic features, as necessary.

- b. *Soils and topography - Describe the soils on the site, giving NRCS (SCS) classifications and descriptions, including limitations of soils. Describe topography, any special site conditions relating to erosion potential, soil stability or other soils limitations, such as steep slopes, highly permeable soils. Provide estimated volume and acreage of soil excavation and/or grading. Discuss impacts from project activities (distinguish between construction and operational activities) related to soils and topography. Identify measures during and after project construction to address soil limitations including stabilization, soil corrections or other measures. Erosion/sedimentation control related to stormwater runoff should be addressed in response to Item 11.b.ii.*

The Soil Survey Geographic (SSURGO) digital database for Hennepin County (USDA NRCS, Accessed 2014) indicates the soils that occur within the project area (**Exhibit 9**) are Urban land-Udipsamments (cut and fill land) complex, 0 to 2% slopes. Urban land consists mainly of industrial parks, office buildings, warehouses, and railroad yards and is covered by impervious surfaces. Most of these urban land areas were originally wet, mineral or organic soils in depressions.

Udipsamments are nearly level areas that have undergone minimal grading and the cut and fill material is predominantly sandy. According to the Hennepin County Soil Survey, because of the variability of both of these components, interpretations for specific uses are not available and onsite investigation is needed. Prior to project construction, the project proposer would be conducting soil borings on the Site to determine if there are site-specific soil limitations and what, if any, necessary soil corrections might be needed for the project.

The estimated volume of soils to be excavated on the Site for both phases is 10,000 cubic yards. Site grading would encompass the entire project area, which is approximately 2.5 acres.

Contour mapping from the MnDNR MNTPOPO online mapping tool indicates surface topography in the project area slopes gently downward from an 844 elevation in the southwest part of the Site to an 840 elevation in the northeast. There are no naturally occurring steep slopes on the Site.

Erosion and sedimentation control BMPs related to stormwater runoff are discussed in greater detail within Item 11.b.ii.

It is anticipated at this time that grading and excavation activities would be limited to accommodate foundations for the proposed structure. No underground parking is proposed on the Site.

NOTE: For silica sand projects, the EAW must include a hydrogeologic investigation assessing the potential groundwater and surface water effects and geologic conditions that could create an increased risk of potentially significant effects on groundwater and surface water. Descriptions of water resources and potential effects from the project in EAW Item 11 must be consistent with the geology, soils and topography/land forms and potential effects described in EAW Item 10.

11. Water Resources

- a. Describe surface water and groundwater features on or near the site in a.i. and a.ii. below.
 - i. Surface water - lakes, streams, wetlands, intermittent channels, and county/judicial ditches. Include any special designations such as public waters, trout stream/lake, wildlife lakes, migratory waterfowl feeding/resting lake, and outstanding resource value water. Include water quality impairments or special designations listed on the current MPCA 303d Impaired Waters List that are within 1 mile of the project. Include DNR Public Waters Inventory number(s), if any.

Surface Waters

The Ritz Block lies within the Middle Mississippi Watershed, which drains to the Mississippi River. The Minnesota Department of Natural Resources (MN DNR) Public Water Inventory Map (PWI), the 2014 update of the National Wetland Inventory (NWI) Map, and the National Hydrography Dataset (NHD) were reviewed and depicted no watercourses or water bodies within the Site (Exhibit 8). The MN DNR PWI and NHD dataset mapping did indicate two watercourses and one water body within one mile of the Site, including the Mississippi River, Bassett Creek, and Loring Pond (27-655 P). NWI mapping indicated one LIUBHh wetland associated with the Mississippi River within one mile of the Site.

Impaired Waters

According to the 2012 Minnesota impaired waters inventory and the MPCA's impaired waters viewer (IWAV), no impaired watercourses or water bodies are located within the project Site. Bassett Creek (No. 07010206-538) and the Mississippi River (07010206-509), located north and east of the Site, respectively, are both listed as impaired waters. Bassett Creek (last inspected 2009) is impaired for chloride, fecal coliform, and fishes bio assessments; the Mississippi River (last inspected 2011) is impaired for Mercury and PCB in fish tissue and fecal coliform.

- ii. *Groundwater – aquifers, springs, seeps. Include: 1) depth to groundwater; 2) if project is within a MDH wellhead protection area; 3) identification of any onsite and/or nearby wells, including unique numbers and well logs if available. If there are no wells known on site or nearby, explain the methodology used to determine this.*

Three aquifers provide the majority of public ground water supply in Hennepin County, the Prairie Du Chien-Jordan, Franconia-Ironton-Galesville, and Mt. Simon-Hinckley. Although groundwater needs are not anticipated, the Prairie Du Chien-Jordan Aquifer would likely provide any ground water appropriations for Ritz Block Site, if needed, as it lies below the center of the Twin Cities.

Groundwater elevations within the vicinity of the Site are between 800 to 820 feet above sea level based on the Geologic Atlas of Hennepin County, Minnesota (1989) C-4, Plate 5. Topographic mapping indicates that elevations on the Site range from approximately 840-844 feet above mean sea level. Consequently, the maximum depth to groundwater is estimated at about 44 feet and the minimum depth to groundwater is estimated at 20 feet below grade. The approximate average depth to groundwater was calculated by averaging the topographic elevations on the Site (842) and subtracting the anticipated groundwater depth shown on the Hennepin County Atlas.

No new water wells are planned for the project. The Minnesota Geological Survey's (MGS) County Well Index (CWI) indicates there is one registered well within the project Site, Unique Well No. 506896. Well No. 506896, located in the west corner of the Site, was completed in 1989 and the static groundwater levels measured 46.7 feet from the land surface at the time of installation (**Appendix C**). Other Unique Well numbers identified nearby, but outside, the project area include: 200362 – Northern States Power, 200621 – Syndicate Building, 200622 – Palace Clothing Co., 200360 – Minneapolis Public Library, 200378 – IBM Building.

The project is not located within a Minnesota Department of Health Wellhead Protection Area.

- b. *Describe effects from project activities on water resources and measures to minimize or mitigate the effects in Item b.i. through Item b.iv. below.*
 - i. *Wastewater - For each of the following, describe the sources, quantities and composition of all sanitary, municipal/domestic and industrial wastewater produced or treated at the site.*
 - 1) *If the wastewater discharge is to a publicly owned treatment facility, identify any pretreatment measures and the ability of the facility to handle the added water and waste loadings, including any effects on, or required expansion of, municipal wastewater infrastructure.*

The types of wastewater produced by the Ritz Block development would be typical of high-density residential developments and commercial office space. No on-site

municipal or industrial wastewater treatment is anticipated or planned and no pre-treatment of wastes from this development is proposed.

Sanitary Waste Estimates

Estimated sanitary waste generation from Towers 1 and 2 of the Ritz Block project would likely fall between 145,188 to 204,156 gallon/day, depending on the final programming of Tower 2. Usage is based on the Metropolitan Council 2014 Sewer Availability Charge (SAC) Procedure Manual.

The above estimates are based on the following calculations:

Tower 1

- 364 residential units at 274 gallons per unit per day = 99,736 gal/day
- 12,000 sq. ft. of retail space at 274 gallons per 3,000 sq. ft. per day = 1,096 gal/day
- 60 seat restaurant at 274 gallons per 10 seats per day = 1,644 gal/day
- Approximately 4,400 sq. ft. gym at 274 gallons per 2,060 sq. ft. per day = 585 gal/day
- 7 outdoor showers at 274 gallons per 17 fixtures per day = 113 gal/day
- 1 dog wash at 274 gallons per sink per day = 274 gal/day

Estimated Total Tower 1 (Residential) = 103,448 gal/day

Tower 2 (to be used as either residential **or** office space)

- 364 residential units at 274 gallons per unit per day = 99,736 gal/day
- Approximately 4,400 sq. ft. gym at 274 gallons per 2,060 sq. ft. per day = 585 gal/day
- 7 outdoor showers at 274 gallons per 17 fixtures per day = 113 gal/day
- 1 dog wash at 274 gallons per sink per day = 274 gal/day

Estimated Total Tower 2 (Residential) = 100,708 gal/day

OR

- 365,606 gross sq. ft. of office space at 274 gallon per 2,400 sq. ft. per day = 41,740 gal/day

Estimated Total Tower 2 (Office) = 41,740 gal/day

Note: Area and unit estimates are derived from project plans (Appendices A and B).

Sewer System Connection and Capacity

The Site is located in sanitary service area MN-310 (interceptor service area B) and is served by the Metropolitan Wastewater Treatment Plant. The Metropolitan Wastewater Treatment Plant, which has a current capacity of 251 million gallons per day, is located near the Mississippi River in St. Paul, MN. The plant is an advanced secondary treatment facility with chlorination and dechlorination steps, ultimately discharging to the Mississippi River.

According to the City's approved Comprehensive Sanitary Sewer Plan (August 2008), the Minneapolis sanitary sewer system was originally constructed as combined sanitary

and stormwater system. However, the sewer system is now used solely for sanitary purposes and thus has capacity to handle the anticipated growth of sewage volume to 17.6 billion gallons by the year 2030. The Metropolitan Plant has the capacity to handle the volume and composition of the sanitary waste discharged from the Site.

The proposed sanitary services would be connected to the City's sewer system located along 3rd Street South (12" Pipe), Marquette Avenue (24" Pipe), 4th Street South (24" Pipe), and Nicollet Avenue (24" Pipe). It should be noted that City of Minneapolis plumbing code for buildings may require sanitary connections at street level to be sized for instantaneous-use scenarios. Consequently, it may be necessary for sanitary sewer connections to be enlarged to accommodate anticipated capacities, or for temporary on-site storage to be provided to mitigate potential peaks from instantaneous use. The specific points of connection to the public system, and size of connections, would be determined with City Staff at the time of application for Building Permits or Preliminary Development Review (PDR).

Mapping of known sanitary infrastructure is provided on the Current Use As-Built Survey (**Appendix D**).

- 2) *If the wastewater discharge is to a subsurface sewage treatment systems (SSTS), describe the system used, the design flow, and suitability of site conditions for such a system.*

Wastewater discharge would not be to a subsurface sewage treatment system (SSTS).

- 3) *If the wastewater discharge is to surface water, identify the wastewater treatment methods and identify discharge points and proposed effluent limitations to mitigate impacts. Discuss any effects to surface or groundwater from wastewater discharges.*

Wastewater discharge is not to surface water. No effects are anticipated to surface or groundwater as treatment would go to the Metropolitan Waste Water Treatment Plant.

- ii. *Stormwater - Describe the quantity and quality of stormwater runoff at the site prior to and post construction. Include the routes and receiving water bodies for runoff from the site (major downstream water bodies as well as the immediate receiving waters). Discuss any environmental effects from stormwater discharges. Describe stormwater pollution prevention plans including temporary and permanent runoff controls and potential BMP site locations to manage or treat stormwater runoff. Identify specific erosion control, sedimentation control or stabilization measures to address soil limitations during and after project construction.*

The Site is located in the Mississippi River Stormwater Drainage Area as shown in the City of Minneapolis's Local Surface Water management Plan (LSWMP).

Pre-Construction Site Runoff

Currently, stormwater runoff on Site is from surrounding roof drainage and parking lots and is not treated. According to the USEPA Urban Nonpoint Source Fact Sheet (2003), 55% or more of stormwater volume in areas dominated by impervious surface (75-100% impervious) leaves the Site as runoff. Given the Site is currently a paved surface parking lot, it is reasonable to assume that the majority of stormwater leaves the Site as runoff. Existing Site runoff would

likely contain pollutants associated with this land use; road salts, sediment, oil, grease, heavy metals and chemicals from motor vehicles. Runoff primarily drains away from the Site to the northeast and towards the Mississippi River. Currently, runoff leaves the Site via overland flow through streets and subsurface flow through the City's storm sewer system. No treatment or stormwater infrastructure exists on the Site.

Construction Stormwater and Erosion Control BMPs and Permitting

Minneapolis, as a large MS4 (Municipal Separate Storm Sewer System) city, is required by federal and state law to obtain and implement a NPDES Stormwater permit administered by the MPCA. MS4s are required to develop and implement a stormwater pollution prevention plan program (SWPPP), and submit an annual report to the MPCA.

To obtain a building permit for the project, the applicant must obtain approval from the City for a Stormwater Management Plan and City of Minneapolis Erosion Control Permit, which among other measures, would require temporary BMPs to treat stormwater runoff prior to discharge to the MS4 infrastructure.

Because the project would involve disturbance of more than one acre of land, application for coverage under the National Pollutant Discharge Elimination System/State Disposal System (NPDES/SDS) General Permit would be submitted to the MPCA prior to initiating earthwork on the Site. This permit is required for discharge of stormwater during construction activity and requires that Best Management Practices (BMPs) be used to control erosion, and that erosion controls be inspected after each rainfall event. Erosion control practices that would be implemented on the Site include, but are not limited to:

1. Silt fence and other erosion control features installed prior to initiation of earthwork and maintained until viable turf or ground cover is established on exposed areas.
2. Street-level inlet protection.
3. Periodic street cleaning and installation of a rock construction entrance to reduce tracking of dirt onto public streets.
4. Stabilization of exposed soils, phased with grading, and
5. Use of sod and landscaping to stabilize exposed surface soils after final grading.

Erosion control plans must be reviewed and accepted by the City of Minneapolis prior to project construction. Because the above BMPs would be implemented during and after construction, potential adverse effects from construction-related sediment and erosion on water quality would be minimized. Stormwater treatment facilities would also be designed and implemented to meet City, Watershed and MPCA requirements.

Post-Construction Site Runoff

After construction, most of the stormwater runoff would come from rooftops, sidewalks, and the parking garage. Runoff from the completed project would contain fewer contaminants than preconstruction as the proposed parking would be covered. It is expected that the post-construction runoff volume would remain the same as current conditions (near 100% impervious), but that runoff rates and contaminants would decrease during storm events as a result of the creation of a green roof and the use of subsurface sedimentation and storage chambers.

The water quality of the stormwater runoff from Phase I in the post-construction setting would be improved by the proposed rooftop and underground rate control and sedimentation facilities. These stormwater features would be designed to remove 70% of post-construction, site generated sediment and maintain peak discharge rates to existing conditions as required under Title 3, Chapter 54 of the Minneapolis City Code. While the Phase 2 stormwater management plan has not been completed, it would also be provided under the same Minneapolis City Code. Because the project is not creating 1 acre or more of new impervious surface, the MPCA post construction stormwater management requirement of the NPDES permit would not apply to this project.

Given that stormwater runoff from the existing parking lot is generally untreated, it is anticipated that the proposed project would provide an overall improvement by reducing rates of runoff and treating runoff waters prior to entering the public storm sewer system.

- iii. *Water appropriation - Describe if the project proposes to appropriate surface or groundwater (including dewatering). Describe the source, quantity, duration, use and purpose of the water use and if a DNR water appropriation permit is required. Describe any well abandonment. If connecting to an existing municipal water supply, identify the wells to be used as a water source and any effects on, or required expansion of, municipal water infrastructure. Discuss environmental effects from water appropriation, including an assessment of the water resources available for appropriation. Identify any measures to avoid, minimize, or mitigate environmental effects from the water appropriation.*

Connection to a public water supply system

The project would have no impact on sole source aquifers. Water would be supplied to the development via the Minneapolis municipal water supply system (Minneapolis Water Works). The City of Minneapolis obtains water from the Mississippi River for potable consumption under the MN DNR's water appropriations permit (No. 786216-1). The permit allows a total system pumping capacity of 125,000 million gallons per year (MG/Y). According to DNR Water Appropriation Records as of 2011, the city reported pumping 20,084.1 MG/Y (average 55.0 million gallons per day).

Based on the assumption that consumption is approximately 110 percent of wastewater generation, estimated water usage from Towers 1 and 2 of the Ritz Block project would likely be between 159,707 to 224,572 gallons/day, depending on the usage of Tower 2 (residential or office space). See sanitary waste estimates in section 11.b.i. for details on usage estimation. Consequently, potable water supplies are adequate to meet the needs of the project without modifications to the existing system.

The proposed fire protection and domestic water services would be supplied from existing water mains in 3rd Street South (16"), Marquette Avenue (12"), 4th Street South (8"), and Nicollet Avenue (16"). Discussions with the City of Minneapolis water department indicate that adequate water supply and pressure is available to meet the needs of the proposed development.

Dewatering

It is unknown at this time whether construction dewatering would be necessary for utility installation. If groundwater is encountered during utility installation, it would be discharged to temporary sediment basins, screened and discharged, or otherwise managed in coordination

with City Staff. If construction dewatering and pumping from the proposed development becomes necessary, permits from the MN DNR and the Metropolitan Council would be obtained. If the quantities exceed the 10,000-gallon per day or 1,000,000 gallons per year thresholds, a DNR Water Appropriation Permit would be obtained. However, it is not anticipated that construction dewatering or pumping from the proposed development would be extensive or continue long enough to require a permit from the DNR.

iv. *Surface Waters*

- a) *Wetlands - Describe any anticipated physical effects or alterations to wetland features such as draining, filling, permanent inundation, dredging and vegetative removal. Discuss direct and indirect environmental effects from physical modification of wetlands, including the anticipated effects that any proposed wetland alterations may have to the host watershed. Identify measures to avoid (e.g., available alternatives that were considered), minimize, or mitigate environmental effects to wetlands. Discuss whether any required compensatory wetland mitigation for unavoidable wetland impacts would occur in the same minor or major watershed, and identify those probable locations.*

No water resources are located within the project area therefore the project would not involve alterations of wetlands.

- b) *Other surface waters- Describe any anticipated physical effects or alterations to surface water features (lakes, streams, ponds, intermittent channels, county/judicial ditches) such as draining, filling, permanent inundation, dredging, diking, stream diversion, impoundment, aquatic plant removal and riparian alteration. Discuss direct and indirect environmental effects from physical modification of water features. Identify measures to avoid, minimize, or mitigate environmental effects to surface water features, including in-water Best Management Practices that are proposed to avoid or minimize turbidity/sedimentation while physically altering the water features. Discuss how the project would change the number or type of watercraft on any water body, including current and projected watercraft usage.*

Best Management Practices to avoid or minimize erosion and sedimentation during construction would be described in the project SWPPP, and deployed as needed. No physical effects or alterations to surface waters are anticipated as a consequence of project development given no surface waters are located within the project boundary or within close proximity to the Site.

12. Contamination/Hazardous Materials/Wastes

- a. *Pre-project site conditions - Describe existing contamination or potential environmental hazards on or in close proximity to the project site such as soil or ground water contamination, abandoned dumps, closed landfills, existing or abandoned storage tanks, and hazardous liquid or gas pipelines. Discuss any potential environmental effects from pre-project site conditions that would be caused or exacerbated by project construction and operation. Identify measures to avoid, minimize or mitigate adverse effects from existing contamination or potential environmental hazards. Include development of a Contingency Plan or Response Action Plan.*

The Site is currently an asphalt surface parking lot and was formerly the site of the Sheraton-Ritz Hotel, which was constructed in 1961 and demolished in 1990. The Site was reviewed using the Minnesota Pollution Control Agency's (MPCA) *What's In My Neighborhood* (WIMN) online tool. This tool is used to find information about environmental permits issued by the MPCA, registrations and notifications required by the MPCA, and investigation of potentially contaminated properties undertaken by the MPCA and its partners.

Results of this search found three records associated with the Site that appear to be related to the former hotel and its subsequent demolition. One inactive record was a tank leak site, which was closed in 1994 and consisted of the release of fuel oil. The presence of remaining contaminated soils and offsite contamination was unknown; however, the record indicated there was no groundwater contamination. The other two records consisted of one with an inactive status related to the removal of two underground storage tanks in 1990, and the other with an active status identifying a small to minimal quantity generator (QG) of hazardous waste. This record was associated with the former hotel on the Site. The WIMN tool did not list information that would be indicative of the presence of dumps, closed landfills, or abandoned storage tanks on the Site.

Additional records were reviewed for areas within approximately 150 feet of the Site and generally consisted of registrations of small to minimal QG's of hazardous waste, tank installation and removals, air and wastewater permits, solid waste utilization projects and inactive leaking tank records.

One record indicates an active State Assessment Site 199 (SA199) located approximately 150 feet southwest of the Site associated with the Baker Parking Ramp. State Assessment sites are locations the MPCA has investigated due to suspected contamination and are assessed to determine if they pose a risk to human health or the environment. This location is also an active Voluntary Investigation & Cleanup (VIC) site. VIC sites are non-petroleum brownfield sites in which the MPCA is helping buyers, sellers, developers or local governments to voluntarily investigate and clean up land for sale, financing or redevelopment. WIMN also lists this property as an active Petroleum Brownfield site. Petroleum Brownfield sites are potentially contaminated with petroleum and the MPCA assists owners in a similar fashion as with VIC sites.

Based on the above WIMN information for the Site, it appears previous potential sources of soil and groundwater contamination have been addressed and closed. However, given the location of the Site in downtown Minneapolis, it is likely that the Site has been occupied by several different structures and uses historically. Consequently, the potential exists for materials to be buried on the Site and for the presence of fill soils that may require special management and/or remediation. The project proposer would prepare a Construction Contingency Plan prior to site development. In the event that materials are encountered during excavation and grading activities that require special management or disposal, they would be handled and disposed of in accordance with the applicable regulations, permits, and practices for those materials.

The National Pipeline Mapping System (NPMS) Public Map Viewer was accessed in December 2014 to determine the presence of hazardous liquid or natural gas pipelines on or adjacent to the Site. Based on the NPMS mapping, there are no hazardous liquid or natural gas pipelines on or adjacent to the Site.

- b. *Project related generation/storage of solid wastes - Describe solid wastes generated/stored during construction and/or operation of the project. Indicate method of disposal. Discuss potential environmental*

effects from solid waste handling, storage and disposal. Identify measures to avoid, minimize or mitigate adverse effects from the generation/storage of solid waste including source reduction and recycling.

No significant volumes of hazardous wastes are anticipated to be encountered/generated during construction and/or operation. Construction activities would generate wastes typical of residential and commercial development operations. The contractor would dispose of wastes generated at the Site in an approved method by using commercial dumpsters and disposing construction wastes at an MPCA-permitted landfill. The contractor would minimize and mitigate adverse effects from the generation of solid waste from demolition and construction activities by recycling construction waste that can be recycled, when feasible.

Following project construction, solid waste generation would be typical of occupied residential/commercial developments of this size and would consist of mixed municipal/residential waste materials. The majority of the solid waste generated would include materials such as paper, organics, plastics, and “other wastes” which includes materials such as appliances, furniture and textiles.

According to the Metropolitan Solid Waste Management Policy Plan 2010-2030 (MPCA, 2011), the Minnesota per capita rate for waste generation is 1.06 tons per person per year. The following residential solid waste generation rate estimates were based, in part, on 2010 City of Minneapolis census data which indicate that the average persons per household is 2.21. Phase I of the project includes 364 residential units. To calculate the estimated amount of waste generated for Phase I of the project, the household occupant number (2.21) was multiplied by the number of units (364) and then multiplied by 1.06 tons per person per year. Using these figures, the residential portion of Phase I of the proposed development could generate approximately 853 tons of solid waste per year. The amount of solid waste produced for the commercial/retail component of Phase I was calculated using a metric of 2.5 pounds (lbs) generated per 1,000 square feet (SF) of office space per day. Phase I of the project includes 12,000 SF of retail space. Using these figures, the retail portion of Phase I could produce approximately 5.5 tons of solid waste per year (2.5 lbs x 12 x 365 days). Consequently, the total estimated solid waste produced by Phase I is approximately 859 tons per year.

Phase 2 developed as residential space, with a similar 364-unit plan, could generate an additional 853 tons of solid waste. Should Phase 2 be developed as office space, it would total 365,606 GSF. The amounts of solid waste produced for proposed office space used a metric of 6 lbs generated per 1,000 SF of space per day. Using these figures, Phase 2 of the project (as office space) could produce approximately 285 tons of solid waste per year (6 lbs x 366 x 260 (working) days) (CalRecycle).

To summarize, Phase I and 2 of the project, with Phase 2 as residential space, could be expected to produce approximately 1,712 tons of solid waste per year. With Phase 2 developed as office space, the development could produce approximately 1,144 tons of solid waste per year.

A source recycle/separation plan for the residential, retail, and office space components of the project would be implemented in accordance with city requirements. Mixed municipal solid waste not recycled would either be incinerated at the Hennepin County Energy Recovery Center or hauled to a sanitary landfill. Participation in the recycling program by future residents of the project area is expected to reduce costs for solid waste trucking and disposal, and generally minimize and mitigate adverse effects from the generation and storage of solid waste.

- c. *Project related use/storage of hazardous materials - Describe chemicals/hazardous materials used/stored during construction and/or operation of the project including method of storage. Indicate the number, location and size of any above or below ground tanks to store petroleum or other materials. Discuss potential environmental effects from accidental spill or release of hazardous materials. Identify measures to avoid, minimize or mitigate adverse effects from the use/storage of chemicals/hazardous materials including source reduction and recycling. Include development of a spill prevention plan.*

It is not anticipated that the proposed project would generate, or require storage of, significant amounts hazardous wastes aside from typical household cleaners. During construction, hazardous materials such as fuels (small quantities stored above ground) and specific construction materials would be on Site during construction and stored and handled in conformance with state and federal regulations to prevent accidental spill or release of hazardous materials. Builders and contractors are responsible for proper management of hazardous materials utilized during construction. The contractor would minimize and mitigate adverse effects from the generation and storage of hazardous wastes by recycling wastes that can be recycled, and by developing a spill prevention plan for the project.

Following construction, the project would likely have emergency generators that would serve as a back-up source of electricity during power failures. The generators would be designed with internal, above-ground fuel tanks.

- d. *Project related generation/storage of hazardous wastes - Describe hazardous wastes generated/stored during construction and/or operation of the project. Indicate method of disposal. Discuss potential environmental effects from hazardous waste handling, storage, and disposal. Identify measures to avoid, minimize or mitigate adverse effects from the generation/storage of hazardous waste including source reduction and recycling.*

Outside of the materials described above, the project is not anticipated to generate or require the storing, handling or disposal of hazardous wastes during construction or operation of the project. Consequently, potential environmental effects from hazardous wastes, and measures to avoid, minimize, or mitigate adverse effects from the generation/storage of hazardous waste (including source reduction and recycling) have not been considered.

13. Fish, wildlife, plant communities, and sensitive ecological resources (rare features):

- a) *Describe fish and wildlife resources as well as habitats and vegetation on or near the site.*

Data and imagery available through USGS, the MN DNR, Google Earth, and the City of Minneapolis was used to conduct a desktop analysis of cover types, habitats, and wildlife resources. The Site area provides little resources to wildlife due to its use as a surface parking lot, lack of vegetation or cover, and high-density infrastructure surrounding the Site on all sides. Wildlife in the Site area is likely limited to species adapted to urban environments and highly fragmented habitat including rock pigeons, black-capped chickadees, house sparrows, grey squirrels, and small rodents.

Cancer Survivor's Park and Gateway Park are within two blocks of the Site and provide open spaces and landscaped areas. Loring Park is within a mile of the Site and provides more substantial

open space, landscaped vegetation, and wetland area for wildlife. In addition, the Mississippi River corridor and associated parkland is located about half a mile north of the Site and provides habitat and resources to a variety of aquatic organisms and birds of prey.

- b) *Describe rare features such as state-listed (endangered, threatened or special concern) species, native plant communities, Minnesota County Biological Survey Sites of Biodiversity Significance, and other sensitive ecological resources on or within close proximity to the site. Provide the license agreement number (LA-**NA**) and/or correspondence number (ERDB-**20150164**) from which the data were obtained and attach the Natural Heritage letter from the DNR. Indicate if any additional habitat or species survey work has been conducted within the site and describe the results.*

Westwood currently has a license agreement with the DNR to use their rare features database information. Westwood mapped data from the Minnesota Natural Heritage Information System (NHIS; MN DNR 2014) to determine if listed plants and animals, native plant communities, wildlife aggregations, geological features, or state rare features are known to occur within or near the project Site (**Exhibit 10**). The database search and mapping did not identify listed plants and animals, native plant communities, wildlife aggregations, geological features, or state rare features within the project boundary. However, several state-listed species and communities of concern were identified within one mile of the Site including peregrine falcons to the south of the Site (last observation 2011), a tricolored bat colony (last observation 2000), and a black sandshell population to the northeast of the Site (last observation 2007).

A NHIS Data Request Form was submitted to the DNR on November 21, 2014, to request information regarding fish, wildlife, and ecologically sensitive resources. The response letter from the DNR, dated December 15, 2014, is provided in **Appendix E**. While the DNR letter acknowledges rare features within an approximate one-mile radius of the proposed project, the records do not include any federally listed species and were either historical or not of concern given the project details provided. As such, the DNR concluded that they do not believe the proposed project would adversely affect any known occurrences of rare features.

According to the Natural Communities and Rare Species of Hennepin County Map (Minnesota County Biological Survey, 1997), the project Site does not contain rare plant or animal species or other significant or otherwise designated natural features or habitat areas.

- c) *Discuss how the identified fish, wildlife, plant communities, rare features and ecosystems may be affected by the project. Include a discussion on introduction and spread of invasive species from the project construction and operation. Separately discuss effects to known threatened and endangered species.*

Project development would convert existing surface parking into high-density housing and retail space. Consequently, the project is not expected to result in a decline in wildlife abundance or species diversity. Measures expected to provide additional habitat for wildlife and help mitigate any potential adverse effects include increased landscaping along sidewalks and corridors and the use of a green roof.

The predominantly impervious and unprotected nature of the Site does not constitute suitable habitat for peregrine falcons, tricolored bats, or black sandshells. Further, it appears unlikely that these species currently utilize the Site for breeding or foraging and therefore are unlikely to be affected by Site development.

Invasive Species

The project proposer understands that the introduction and spread of invasive weed species from project construction and operation requires consideration. While there is the opportunity for invasive weed species to be introduced during project construction, it is unlikely that these species would persist in a meaningful way following construction. The Ritz Block project would be landscaped with turf grass and landscape trees and shrubs per a city-approved landscaping plan. Consequently, large areas of exposed soils where invasive weed species might appear are not expected. If large areas of invasive species develop, they would be controlled by the applicant in accordance with local and state invasive and noxious weed regulations.

- d) Identify measures that would be taken to avoid, minimize, or mitigate adverse effects to fish, wildlife, plant communities, and sensitive ecological resources.

The Ritz Block project is unlikely to have negative effects on fish, wildlife, plant communities, or sensitive ecological resources due to its location and the current Site use.

14. Historic properties

Describe any historic structures, archeological sites, and/or traditional cultural properties on or in close proximity to the site. Include: 1) historic designations, 2) known artifact areas, and 3) architectural features. Attach letter received from the State Historic Preservation Office (SHPO). Discuss any anticipated effects to historic properties during project construction and operation. Identify measures that would be taken to avoid, minimize, or mitigate adverse effects to historic properties.

Several cultural resource studies have been undertaken recently in the vicinity of the project area, generally for transit projects. No archaeological survey has been conducted to date in the project area, and no previously recorded archaeological sites are located within or immediately adjacent to the project area. However, the current project area was considered to have potential for extant buried archaeological resources during the Cultural Resources Literature Review and Visual Assessment for the Nicollet-Central Transit Alternatives Study (106 Group, 2013).

Many structures listed on or eligible for the National Register of Historic Places (NRHP) are located within the general area. Two structures listed on or eligible for listing on the NRHP are immediately adjacent to the south of the project area. These structures are the NRHP eligible Northern States Power Company (SHPO Inventory #: HE-MPC-0450) and the NRHP listed Farmers and Mechanics Savings Bank (SHPO Inventory #: HE-MPC-0341).

An additional five NRHP listed and one NRHP eligible structures are located within or near an approximate 500-foot buffer of the project area. These structures are provided in the table below.

Table 14.1. NRHP Listed and Eligible Structures

Structure Name	Inventory Number	NRHP Status
Warehouse (Lakeland Floral)	HE-MPC-0085	Listed
Lyman-Eliel Drug Company	HE-MPC-0086	Listed
Lumber Exchange Building	HE-MPC-3043	Listed
First National/Soo Line Building	HE-MPC-0345	Listed

Marquette National Bank Building	HE-MPC-0444	Eligible
Rand Tower	HE-MPC-0445	Listed

The Lumber Exchange Building, the Farmers and Mechanics Savings Bank, the Soo Line Building, and the Rand Tower are also locally designated. The project area is outside of the boundary of the St. Anthony Falls Historic District, located approximately 850 feet to the north, and outside of the boundary of the Warehouse Historic District, which is approximately 550 feet to the west. No direct physical impacts are anticipated upon any of the historic structures.

15. Visual

Describe any scenic views or vistas on or near the project site. Describe any project related visual effects such as vapor plumes or glare from intense lights. Discuss the potential visual effects from the project. Identify any measures to avoid, minimize, or mitigate visual effects.

There are no scenic views or vistas located on or near the property, and no non-routine impacts or visual nuisances are anticipated. The proposed residential and office land uses are consistent with other established uses in the Downtown area, and therefore would not create a significant change in visual aesthetics.

16. Air

- a. *Stationary source emissions - Describe the type, sources, quantities and compositions of any emissions from stationary sources such as boilers or exhaust stacks. Include any hazardous air pollutants, criteria pollutants, and any greenhouse gases. Discuss effects to air quality including any sensitive receptors, human health or applicable regulatory criteria. Include a discussion of any methods used assess the project's effect on air quality and the results of that assessment. Identify pollution control equipment and other measures that would be taken to avoid, minimize, or mitigate adverse effects from stationary source emissions.*

No stationary source emissions are anticipated; therefore, no mitigation is required. The natural gas heating and cooling systems proposed for the buildings are expected to consist of individual furnace/air conditioning systems for both Phase I and Phase 2. Emissions from the heating and cooling units would be typical of other buildings in the B4 Business District.

- b. *Vehicle emissions - Describe the effect of the project's traffic generation on air emissions. Discuss the project's vehicle-related emissions effect on air quality. Identify measures (e.g. traffic operational improvements, diesel idling minimization plan) that would be taken to minimize or mitigate vehicle-related emissions.*

Increased traffic would generate a relatively small corresponding increase in carbon monoxide levels and other vehicle-related air emissions. Local regulations exists for vehicle idling. Hook ups may be installed for commercial vehicles that allow for the shutting off of truck engines and auxiliary equipment during deliveries. The project is expected to have a negligible impact on air quality. Consequently, baseline air quality monitoring, or predictive air quality modeling, has not been contemplated at this time, and no measures to mitigate air quality impacts have been considered. It is anticipated that siting residential units near office and retail would promote other

modes of transportation such as walking, bike riding, and mass transit for overall emission reductions.

- c. *Dust and odors - Describe sources, characteristics, duration, quantities, and intensity of dust and odors generated during project construction and operation. (Fugitive dust may be discussed under item 16a). Discuss the effect of dust and odors in the vicinity of the project including nearby sensitive receptors and quality of life. Identify measures that would be taken to minimize or mitigate the effects of dust and odors.*

Project construction and occupancy is not expected to generate objectionable odors or dust. Odors and dust generated during construction and occupancy would meet the requirements of the MPCA and applicable local regulations. The nearest receptors to the proposed project are The Minneapolis Public Library, The Family Justice Center, the Xcel Energy office building, Marquette Plaza and Cancer Survivors Park.

The project would not generate significant odors during construction or operation. Minor odors generated during construction would be typical of those associated with urban construction processes, such as exhaust from diesel and gasoline powered construction equipment.

The construction process is expected to generate some dust, but it is not anticipated that fugitive dust would be generated in objectionable quantities. During demolition and construction, contractors would follow best management practices to reduce dust emissions. Suppression of airborne dust by application of water would be implemented if significant fugitive dust generation occurs during equipment operation that is greater than routinely expected during normal construction practices. Demolition for both Phase 1 and 2 of the project would be limited to removal of bituminous surface parking and pay stations.

17. Noise

Describe sources, characteristics, duration, quantities, and intensity of noise generated during project construction and operation. Discuss the effect of noise in the vicinity of the project including 1) existing noise levels/sources in the area, 2) nearby sensitive receptors, 3) conformance to state noise standards, and 4) quality of life. Identify measures that would be taken to minimize or mitigate the effects of noise.

The Minneapolis Code of Ordinances and MPCA noise requirements regulate noise levels within the city for construction and operation (mechanical noise) at project sites. Construction and operation of the project would be required to comply with these noise requirements, including hours of operation of construction equipment. It is anticipated that noise levels would temporarily increase locally during project construction, but are expected to return to intensities and levels consistent with a downtown business district environment. Noise levels on and adjacent to the Site would vary considerably during construction depending on the pieces of construction equipment being operated simultaneously, the percent of time in operation, and the distance from the equipment to the receptors. The nearest receptors to the proposed project are The Minneapolis Public Library, The Family Justice Center, the Xcel Energy office building, Marquette Plaza and Cancer Survivors Park. Planned landscaping at the perimeter of the project, and at outdoor amenity levels, would help to minimize and mitigate the effects of any negligible noise generated from the project following construction. Noise levels following construction are anticipated to be consistent with other sources within the B4 Business District and in conformance with city and state noise standards.

18. Transportation

- a. Describe traffic-related aspects of project construction and operation. Include: 1) existing and proposed additional parking spaces, 2) estimated total average daily traffic generated, 3) estimated maximum peak hour traffic generated and time of occurrence, 4) indicate source of trip generation rates used in the estimates, and 5) availability of transit and/or other alternative transportation modes.

1. Existing and Proposed Additional Parking Spaces –

The existing land use is a surface parking lot. There are 315 parking spaces on the parcel.

The proposed land uses and corresponding parking supply for this site include:

a. Tower 1

364 residential units	414 parking spaces
12,000 sq. ft. retail	8 parking spaces
<u>Visitor parking</u>	<u>8 parking spaces</u>
Total for Tower 1	430 parking spaces

b. Tower 2 (RESIDENTIAL OPTION)

<u>364 residential units</u>	<u>479 parking spaces</u>
Total for Tower 2	479 parking spaces

-- OR --

c. Tower 2 (OFFICE OPTION)

<u>365,606 Office GSF</u>	<u>146 parking spaces</u>
Total for Tower 2	146 parking spaces

Therefore the total parking for the Ritz Block is either 909 spaces under the residential option for Tower 2, or 576 parking spaces for the office option for Tower 2. This translates to an additional 594 parking spaces under the Residential Option for Tower 2, or an additional 261 parking spaces under the Office Option for Tower 2, comprised mostly of structured above-ground parking stalls to serve the tenants.

2. Estimated Total Average Daily Traffic Generated –

Based on previous TDM Plans in the area and the types of proposed land uses, the following mode split goals for the project have been identified by the developer:

Table 18.1 -- Mode Split Goals

Mode Split	Goal
Auto	40%

Transit	50%
Bike/Walk	10%

Therefore, by applying this modal share for auto trips generated by the site, the total traffic entering and exiting the site is shown on Table 18.2. (NOTE: This table assumes Phase 2 is developed as office use, so as to model the more intense traffic impacts.)

Table 18.2 -- Trip Generation Estimates with Modal Share – Proposed Land Use (Towers 1 & 2 [Office])

Land Use	ITE Code ¹	Equation or Rate ¹	Size	Weekday Enter	Weekday Exit	AM Enter	AM Exit	PM Enter	PM Exit
High-Rise Apartment	222	Rate	364 units	306	306	11	33	31	20
Specialty Retail	814	Rate	12,000 sq. ft.	154	154	9	9	16	16
Office	710	Equation	365,606 sq. ft.	703	703	190	26	33	162
Subtotal				1,163	1,163	205	68	80	198
Total				2,326		273		278	

¹ Rates and equations based on ITE Trip Generation Manual, Ninth Edition, 2012.

The total average auto trip generation for the site is approximately 2,326 vehicular trips per day.

3. Estimated Maximum Peak Hour Traffic Generated and Time of Occurrence –

The table above shows the trip generation for AM and PM Peak Hours. The estimated maximum peak hour auto traffic would be generated in the PM Peak Hour (278 trips/hour).

4. Indicate source of trip generation rates used in the estimates –

Source: Trip Generation Manual, Ninth Edition, Institute of Transportation Engineers, Washington, DC, 2012.

5. Availability of Transit and/or Other Alternative Transportation Modes –

Currently, there are many transit and alternative transportation modes available to tenants, residents, employees and customers coming to and from this site. Several Metro Transit bus stops exist on each street bordering the Ritz Block, that provide access to all portions of the metro Twin Cities area. The Nicollet Mall transit stops lie immediately north of the site. The Metro Transit's BLUE and GREEN LRT lines are accessible one block to the west of this site at the Nicollet Mall station. There are a vast array of sidewalks and bicycle routes that crisscross downtown Minneapolis, and are within walking and riding distance of the Ritz Block.

Regarding alternate modes during the warmer months, NiceRide MN has located a station for shared bicycles on the Nicollet Mall side of the Ritz Block. Further, shared auto companies such as HOURCAR, have stations within a few blocks of the Ritz Block site. Other shared vehicle companies such as Car2Go and ZipCar have emerged and provide internet based rental of vehicles, with availability based on usership.

Recently, the City of Minneapolis has studied the establishment of a streetcar line along the Nicollet Mall and beyond. There is a potential streetcar stop being proposed at the northeast corner of the Ritz Block site.

- b. *Discuss the effect on traffic congestion on affected roads and describe any traffic improvements necessary. The analysis must discuss the project's impact on the regional transportation system. If the peak hour traffic generated exceeds 250 vehicles or the total daily trips exceeds 2,500, a traffic impact study must be prepared as part of the EAW. Use the format and procedures described in the Minnesota Department of Transportation's Access Management Manual, Chapter 5 (available at: <http://www.dot.state.mn.us/accessmanagement/resources.html>) or a similar local guidance,*

A traffic impact study was conducted for the Ritz Block site. Because of the proximity to downtown businesses, shopping and entertainment, reliance on auto travel is less likely by tenants of The Ritz Block residential units. Further, the availability of alternated modes of travel (i.e., transit, pedestrian, bicycle, etc.) translates to fewer auto trips during weekday peak traffic periods, thus lessening the overall impact to the regional highway transportation system.

If Tower 2 is constructed as a high-rise office building, the proximity to alternative modes of transportation can be a good substitute to automobile commuting and downtown parking. Thus, as with many downtown residential and/or office high-rise buildings, the impact to the regional transportation system is less dependent on highway capacity and more dependent on alternate modes.

- c. *Identify measures that will be taken to minimize or mitigate project related transportation effects.*

The Ritz development would minimize or mitigate project related transportation effects; via the adoption of Travel Demand Management Plans for each tower, including strategies such as:

- Support and encourage alternate modes of transportation by tenants and employees; and provide information to its users on availability of these modes
- Locate loading dock and delivery areas off of City streets and onto the service drive
- Provide full access off of local streets at midpoints of 3rd Street and 4th Street South, without direct access onto of off of Nicollet Mall or Marquette Bus routes.

Full recommendations and conclusions can be found in **Appendix F** – Travel Demand Management Plan and Traffic Impact Study.

19. Cumulative potential effects: (Preparers can leave this item blank if cumulative potential effects are addressed under the applicable EAW Items)

- a. *Describe the geographic scales and timeframes of the project related environmental effects that could combine with other environmental effects resulting in cumulative potential effects.*

It is anticipated that the project would be constructed in two phases, with Phase I expected to begin in 2015. Full build-out is anticipated by 2019; however, construction timing would ultimately depend upon market conditions.

Cumulative effects of this and future projects on natural resources and infrastructure are expected to be roughly proportional to the impacts discussed in this EAW, or somewhat greater if future projects are developed at a higher density. The City of Minneapolis has planned for future growth and development as part of the *Minneapolis Plan for Sustainable Growth* (the City's Comprehensive Plan (2009)), *Local Surface Water Management Plan* (2006), the *Ten-Year Downtown Transportation Action Plan* (2007), and the *Ten-Year Citywide Transportation Action Plan* (2009). These efforts would ensure that the cumulative impacts of future growth and development to the environment, and to the City's service capacity, are anticipated and mitigated.

- b. *Describe any reasonably foreseeable future projects (for which a basis of expectation has been laid) that may interact with environmental effects of the proposed project within the geographic scales and timeframes identified above.*

The project proposer does not currently own or have options on adjacent lands. Surrounding parcels are largely developed, with the exception of the city-owned parking lot (Parcel I.D. 22-029-24-41-0107) located to the northwest. Because available lots develop based on market drivers and conditions, the timing of future development can be difficult to predict. The City's Comprehensive Plan anticipates and guides the intensity of development within the city and directs necessary infrastructure improvements to support future development projects. These planning efforts serve to avoid and mitigate potential cumulative environmental effects from projects that may be completed within the same general geographic area and timeframes.

- c. *Discuss the nature of the cumulative potential effects and summarize any other available information relevant to determining whether there is potential for significant environmental effects due to these cumulative effects.*

Minor, cumulative impacts to city infrastructure such as roads, sewer, and water would occur should surrounding parcels develop into other uses. However, these cumulative impacts have been contemplated and addressed in the *Minneapolis Plan for Sustainable Growth*, and other plan documents previously discussed. Should surrounding properties develop in the future, they would be evaluated under the Minnesota Environmental Policy Act (MEPA) rules, and would adhere to guidelines presented in the City's approved zoning and comprehensive plans.

Mitigation for anticipated minor cumulative impacts in the area would include providing a green roof and other landscaping, pretreating stormwater and controlling stormwater rates. These provisions would help minimize cumulative effects from past and future developments. Given the nature of potential cumulative effects, the evaluation of available and relevant information, and

mitigation efforts proposed, the Ritz Block project is not expected to result in significant environmental effects.

20. Other potential environmental effects:

If the project may cause any additional environmental effects not addressed by items 1 to 19, describe the effects here, discuss the how the environment would be affected, and identify measures that would be taken to minimize and mitigate these effects.

All known potentially adverse environmental effects are addressed in the preceding sections.

RGU CERTIFICATION. (The Environmental Quality Board would only accept **SIGNED** Environmental Assessment Worksheets for public notice in the EQB Monitor.)

I hereby certify that:

- The information contained in this document is accurate and complete to the best of my knowledge.
- The EAW describes the complete project; there are no other projects, stages or components other than those described in this document, which are related to the project as connected actions or phased actions, as defined at Minnesota Rules, parts 4410.0200, subparts 9c and 60, respectively.
- Copies of this EAW are being sent to the entire EQB distribution list.

Signature Becca Farrar-Hughes Date 2/23/15

Title: Becca Farrar-Hughes, Senior City Planner